

REMARKS:

This application has been carefully studied and amended in view of the Office Action dated December 1, 2003. Reconsideration of that action is requested in view of the following.

Claim 19 has been amended to more clearly define the invention. Claims 25-27 have been replaced by claims 44-46. Claims 42-43 have been canceled to advance the prosecution of this case.

Claims 1-19, 22-24, 28-41 and 44-46 are now pending.

In view of the rejection of various claims under the doctrine of obviousness-type double patenting with respect to parent U.S. Patent No. 6,372,334 a Terminal Disclaimer is submitted herewith. Accordingly, that double patenting rejection should be withdrawn.

Since Claims 42-43 have been canceled the double patenting rejection over U.S. Patent No. 5,888,600 is now moot and should be withdrawn.

Similarly, because Claims 42-43 have been canceled to advance the prosecution of this case the rejection of those claims under EP'561 is now moot.

Claims 19, 22-24 and 26-29 had been rejected as anticipated by Wycech '526, while Claim 25 was rejected as obvious over Wycech '526. Of this group of claims, Claim 19 is the only

independent claim. Claim 19 has been amended to more clearly define over Wycech. In that regard, Claim 19 has been amended to define the pattern of holes as comprising paint read-through control structure and also to define the pattern of holes as being in a plurality of rows and a plurality of columns and wherein each of the rows and each of the columns also includes a plurality of holes. This amendment to Claim 19 is supported by the specification such as in Figures 8-11 and the corresponding description on pages 10-13 of the specification. The inclusion of these features in Claim 19, moreover, does not raise new issues since original Claims 25-27 were directed to the various alternatives for the patterns of holes, namely, wherein the holes are arranged in rows and columns which could be (1) aligned rows and columns, (2) staggered rows and columns or (3) in a more random arrangement where the rows and columns are not straight. In that regard, Claims 25-27 have been replaced by Claims 44-46 so as to provide claim language in the dependent claims more consistent with the language in the now amended parent Claim 19. With regard to Claim 46 reference is made to page 13, lines 5-7 of the specification pointing out that the random pattern results where the rows and columns are not straight.

In the rejection of Claim 19 Examiner Vo had taken the position that Wycech '526 disclosed in Figure 2 a "laminate comprising a plurality of through-holes 32 and 26". In the

obviousness rejection of Claim 25 Examiner Vo recognized that "Wycech does not disclose the precise orientation of the holes as presently claimed", but concluded "that the precise orientation of the holes involves only routine skill in the art and would vary according to the needs of the particular application".

It is respectfully requested that reconsideration be given of the position taken by the examiner in the prior Office Action. Wycech '526 is very clear that the purpose of the through holes 26 and 32 is "for the passage of electrical wiring or the like". (Col. 6, line 14) As such, and as shown in Figure 2, there are only a limited number of isolated holes in order to fulfill the intended function of permitting the passage of electrical wires or the like.

In contrast, the purpose of the holes as disclosed in the specification and as now recited in Claim 19 is to provide paint read-through control structure. This is accomplished by providing more than simply a few isolated holes as is disclosed and suggested in Wycech '526. Rather, there are a plurality of holes in the sense that the pattern of holes is such that the holes are arranged in rows and columns with each row and column itself having a plurality of holes. This thereby results in a different number and arrangement of holes in order to accomplish the control of paint read-through as defined in Claim 19 as contrasted to the few isolated through holes being provided simply to accommodate

electrical wiring as disclosed in Wycech '526.

Since the through holes disclosed in Wycech '526 differ structurally from what is being claimed in parent Claim 19, and since the purpose of the holes in Wycech '526 differs from the purpose of the holes being claimed in parent Claim 19, there would be no reason or motivation from the prior art to alter the Wycech '526 structure so as to result in the claimed arrangement. Such reason would come only from applicant's own teachings in this application. Accordingly, parent Claim 19 and its dependent claims should be patentable over Wycech '526.

In view of the above remarks and amendments this application should be passed to issue.

If Examiner Vo maintains the rejection of Claim 19 and its dependent claims, this amendment should be entered since it places the application in better condition for appeal. In that regard, the issues are reduced by the cancellation of Claims 42-43 thereby obviating the rejections of those claims over the prior art and on the ground of double patenting. Moreover, the amendment to Claim 19 does not raise new issues since the added features were encompassed in dependent Claims 25-27, now cancelled.

Respectfully submitted,

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